

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 1:19-CR-25-02

vs.

Hon.: ROBERT J. JONKER
CHIEF U.S. DISTRICT JUDGE

MOHAMED SALAT HAJI,

Defendant,

**MOTION FOR
DOWNWARD VARIANCE**

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NOW COMES Defendant, Mohamed Salat Haji, by and through his counsel of record, Daniel R. Fagan & Associates, P.C. by Daniel R. Fagan and does hereby move this Court pursuant to 18 U.S.C. § 3553(a) and other authority for a downward variance from the advisory guidelines range.

This motion is supported by the accompanying Sentencing Memorandum and Brief in Support of Motion for Downward Variance.

Dated: September 15, 2021

Respectfully submitted,

/s/ Daniel R. Fagan
Daniel R. Fagan (P39735)
Attorney for Defendant